



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

TDD (804) 371-8737

MAR 31 1992

CERTIFIED RETURN  
RECEIPT REQUESTED

Mr. Raymond C. Sullivan  
Industrial Manager  
Government of the District of Columbia  
Industries Division  
Department of Corrections  
Box 730  
Lorton, Virginia 22079

Re: DC Dept of Corrections  
EPA ID# VAD980830988

Dear Mr. Sullivan:

On January 22, 1992, an inspection was conducted at the District of Columbia Department of Corrections, Industries Division located at central facility, Lorton, Virginia. During that inspection, it was noted that the facility was not in compliance with portions of the Virginia Hazardous Waste Management Regulations (VHWMR) applicable to large quantity generators. Instances of noncompliance are indicated by check marks on the enclosed inspection checklists completed for this visit and are listed below:

1. The facility has not notified the Virginia Department of Waste Management of the exact location of existing accumulation areas (VHWMR § 6.4.E.1.e., 6.4.E.3.b., & 6.4.E.1.b.).
2. The facility did not submit an annual report for the preceding calendar year (VHWMR § 6.5.B.).

3. Contingency Plan:

- a. The facility did not have a detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes (VHWMR § 9.3.B.1 - 2.).
- b. The facility did not have a description of arrangements agreed to by local police and fire departments, Commonwealth and local emergency response teams, local hospitals, and contractors to coordinate emergency responses if required (VHWMR § 9.3.B.3.).
- c. The facility did not have a listing of names, addresses, office, and home telephone numbers of all persons qualified to act as emergency coordinators (VHWMR § 9.3.B.4.).
- d. The facility did not have a list of the appropriate emergency equipment necessary to cope with emergencies at the facility (VHWMR § 9.3.B.5.).
- e. The facility did not have a list specifying the location and physical description of all emergency equipment and a brief outline of its capabilities (VHWMR § 9.3.B.6.).
- f. The facility did not have a documented evacuation plan in the event of an emergency (VHWMR § 9.3.B.6.).
- g. The facility did not submit copies of contingency plan to local police departments, fire departments, hospitals and Commonwealth and local emergency response teams that may be called upon to provide emergency services, and no documentation to indicate that all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams have received the contingency plan (VHWMR § 9.3.C.).

Please be aware that District of Columbia Department of Corrections must notify the Virginia Department of Waste Management of the exact location of all hazardous waste accumulation areas. In the future, if additional hazardous waste areas are found at the facility, District of Columbia Department of Corrections must notify the Director of the Virginia Department of Waste Management of their exact location fifteen days prior to using them, in accordance with VHWMR Section 6.4.E.1.e.

The violations noted (in items 3a through 3g above) all relate to the establishment of an contingency plan for the facility. You do have a contingency plan, but it is not complete. An outline of the information required in a hazardous waste management contingency plan is enclosed.

The District of Columbia Department of Corrections should submit copies of the contingency plan by certified mail to local police departments, fire departments, hospitals and Commonwealth and local emergency response teams. The District of Columbia Department of Corrections should supply documentation to indicate that all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams have received the contingency plan.

Mr. Raymond C. Sullivan  
DC Dept of Corrections  
Page 3

Please take appropriate measures to correct the compliance deficiencies noted above. The Virginia Department of Waste Management requests that you submit documentation demonstrating the corrective measures have been undertaken in response to above deficiencies within 30 days of receipt of this letter.

The violations identified in this letter are being referred to the Compliance and Enforcement Staff for consideration of further action.

Thank you for your cooperation and assistance during the January 22, 1992, inspection. If you have any questions, please write or call Mohammad R. Habibi, Area Manager, Compliance and Enforcement at (804) 225-3237.

Sincerely,



Richard E. Fox, Jr.  
Chemist  
Emergency Response

Enclosures

cc: James A. Saunders  
John E. Ely  
Mohammad R. Habibi

HAZARDOUS WASTE MANAGEMENT  
CONTINGENCY PLAN  
(VHWMR Section 9.3)

I. FACILITY GENERAL INFORMATION

- A. Facility Name
- B. Location
- C. Telephone Number
- D. Description of Hazardous Waste Activities
  - 1. Processes or Operations which generate hazardous waste(s).
  - 2. Description of wastes generated, including classification of waste generated (i.e., waste code).
  - 3. Description of accumulation method, including types of containers or tanks, and disposal method. Also include any treatment taking place on-site.
- E. Facility Site Plan with Hazardous Waste Generation and Accumulation Areas Indicated.

II. COORDINATION AGREEMENTS WITH LOCAL AUTHORITIES

Describe any and all arrangements with local authorities to provide assistance or coordinate emergency services, as required. [Note: If the authority is to perform some sort of response or remediation action referenced in the plan, a coordination agreement must be established.]

- A. List of Local Authorities Receiving copies of the contingency plan.
- B. Coordination Agreements with Local Authorities
  - 1. Fire
  - 2. Police
  - 3. Hospital
  - 4. Other Emergency Response Units

III. EMERGENCY COORDINATOR(S)

- A. Primary
  - 1. Name

2. Home Address
  3. Home and Work Telephone Numbers
- B. Alternate(s) [in the order in which they are to respond]
1. Name(s)
  2. Home Address(es)
  3. Home and Work Telephone Numbers
- C. Description of specific duties of the Emergency Coordinator in case of an emergency.
- D. Statement of Authority to commit resources (See VHWMR Section 9.3.E).

IV. IMPLEMENTATION OF PLAN

- A. Address each of the following potential problems:
1. Fires
  2. Explosions
  3. Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to:
    - a. Air
    - b. Soil
    - c. Groundwater
    - d. Surface Water

[Note: If potential for any of the above does not exist, it should be so stated in the plan.]

- B. Specific Procedures to respond to and remedy each problem - Each type of procedure should specify Who, When, Where, and How.
1. Notification of emergency plan personnel and local authorities;
  2. Control and containment;
  3. Clean-up and disposal;
  4. Return to fit-for-use status.

V. EMERGENCY EQUIPMENT

- A. Inventory and Capabilities of all emergency equipment necessary to provide the response and remediation actions in III above.
- B. Locations of all the equipment listed in item A above.
- C. Equipment Available from other sources (if necessary)

VI. EVACUATION PLAN

- A. Description of when evacuation will be necessary (include who is to make this decision).
- B. Description of signal to be used to initiate evacuation (include who is to make signal).
- C. Map indicating primary evacuation routes.
- D. Map indicating alternate evacuation routes should primary routes be blocked.

VII. REPORTS

- A. Description of notification procedure to State Agencies and Local Authorities prior to resumption of activities in affected area that released-waste contaminated soil, etc., has been treated, stored, and/or disposed, and all emergency equipment is cleaned and ready for use.
- B. Report of incident to Executive Director.
  - 1. Oral notification prior to resumption of operations.
  - 2. Written report within fifteen days.

MARCH 1991

SURVEY SHEET  
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: D. C. Dept of Corrections

Address: Industries Division, Box 730

Lorton, VA 22079

EPA ID Number: VAD980830988

Facility Representative: Raymond C. Sullivan

Title: Industrial Manager

Telephone Number: (703) 643-2142

Inspector's Name: Richard E Fox Jr.

Title: Chemist

Date of Inspection: 1/22/92

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) Furniture Mfg.

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

F002 Methylene Chloride  
F003, F005 Paint waste  
F001 1,1,1, Trichloroethane

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
<u>F002</u>	<u>7920 lb</u>	<u>7920 lb</u>
<u>F003, F005</u>	<u>880 lb</u>	<u>880 lb</u>
<u>F001</u>	<u>2200 lb</u>	<u>2200 lb</u>

4. Does the facility ever generate greater than:  
1 kg. of acutely toxic waste (P listed waste or YES (NO)  
F020-F023 and F026-F027)?

100 kg of clean-up from a spill of P listed waste YES (NO)  
or F020-F023 and F026-F027 waste?

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent?  
(List all transporters and facilities, or on-site treatment  
performed).

Hazardous waste being sent off-site,  
Safety-Kleen Environmental Systems, Highway 46, Newcastle,  
Kentucky Hazmat Environmental Group

6. Does the facility generate any hazardous waste YES (NO)  
that is excluded from regulation? If yes, list the  
waste and the basis for exclusion. \_\_\_\_\_,  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Does the facility generate any hazardous waste YES (NO)  
that is burned for energy recovery (hazardous waste  
fuel)? If yes, list the waste, where it is sent, and  
complete the Recyclable Materials Checklist.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. Does the facility generate any used oil that YES (NO)  
is burned for energy recovery (used oil fuel),  
including used oil that is also a characteristic  
hazardous waste, or used oil that is mixed with  
hazardous waste generated by a conditionally exempt  
Small Quantity Generator? If yes, list the waste, where  
it is sent, and complete the Recyclable Materials Checklist.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



9. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. YES ☒ NO

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10. Does the facility transport, collect or reclaim spent lead-acid batteries? If yes, complete the Recyclable Materials Checklist. YES ☒ NO

11. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- ☒ c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)

[Circle All That Are Applicable]

12. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5 55-gallon drums) of non-acute hazardous waste, at which time the accumulation times (180 days or 270 days) for small quantity generators begins.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

13. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	Number of Containers	Number of Tanks	Capacity
Behind Repair Shop	12		55 gal
Furniture Shop	1		55 gal

14. Comments

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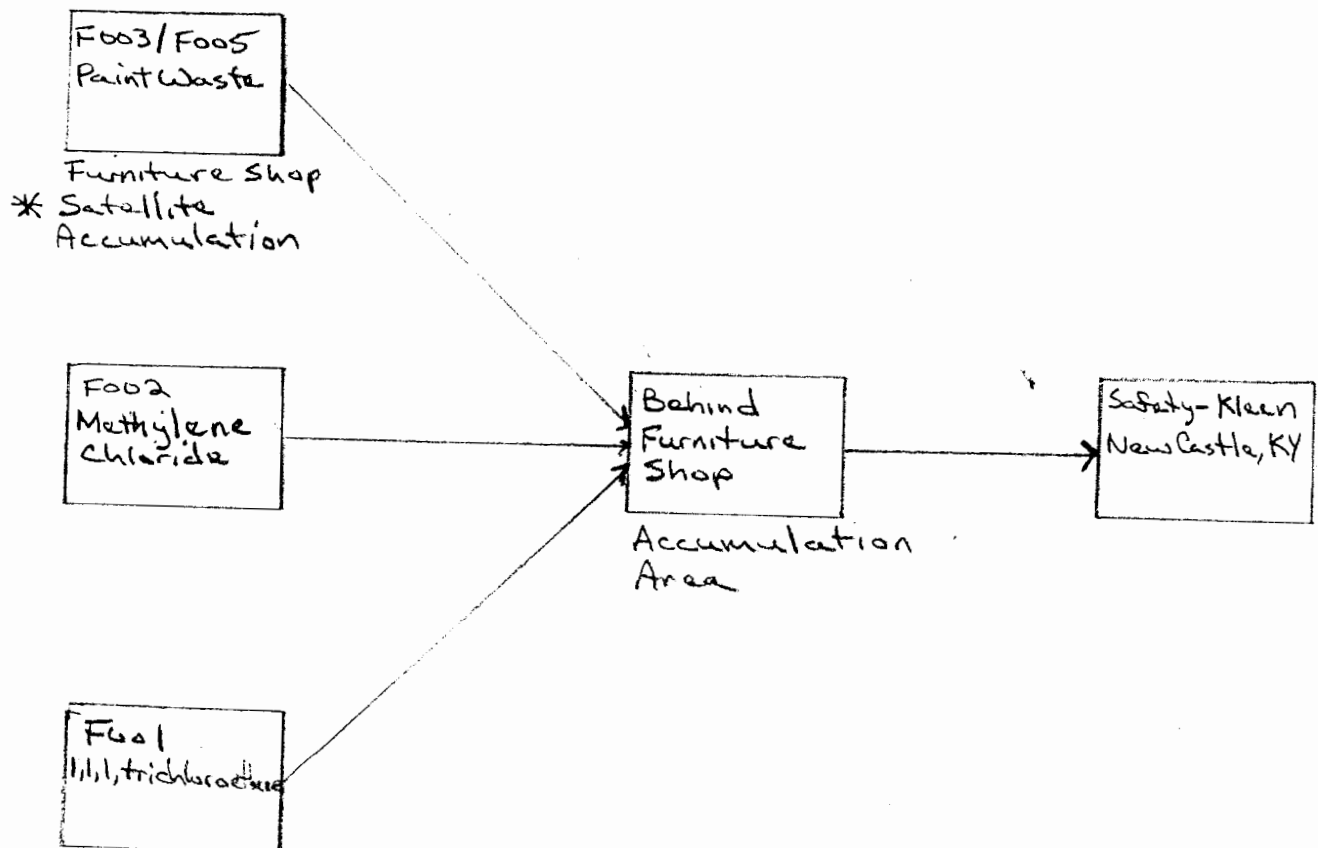
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## 15. Waste Management Flow Diagram

(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)



MARCH 1991

CHECKLIST FOR HAZARDOUS WASTE  
INSPECTION OF GENERATORS

Name of Facility: D. C. Dept of Corrections  
Address: Industries Division, Box 730  
Lorton, VA 22079  
EPA ID Number: VAD980830988  
Facility Representative: Raymond C. Sullivan  
Title: Industrial Manager  
Telephone Number: (703) 643-2142  
Inspector's Name: Richard E Fox, Jr  
Title: Chemist  
Date of Inspection: 1/22/92

Va. Hazardous Generator Checklist  
Waste Reg.

- 6.3. 1. Is a manifest system currently being used for all hazardous waste shipped off site? ☒ YES ☐ NO
- 6.2.C. 2. Has the generator determined that the transporter(s) and facility have an EPA ID number? [Note: Shipments to POTWs must be manifested and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.] ☒ YES ☐ NO
- 5.5.A.7 3. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit? ☒ YES ☐ NO
- 6.3  
5.3.B.1. 4. Is the following information on the manifest:

- a. The generator's name, mailing address, EPA ID Number, and telephone number? ☒ YES ☐ NO
- 5.3.B.2. b. A unique five digit number assigned to this manifest by the generator? ☒ YES ☐ NO
- 5.3.B.3. c. The total number of pages of the manifest? ☒ YES ☐ NO
- 5.3.B.4. d. The company name and EPA ID number of each transporter used? ☒ YES ☐ NO
- 5.3.B.5. e. The company name, site address, and EPA ID number of the facility designated to receive the waste? ☒ YES ☐ NO
- 5.3.B.6. f. The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material? ☒ YES ☐ NO
- 5.3.B.7. g. The quantities of waste being shipped? ☒ YES ☐ NO
- 5.3.C. h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment." ☒ YES ☐ NO

6.5.C.2.

5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? ☒ YES ☐ NO

If no, has the generator filed an exception report with the Executive Director which included: ☒ YES ☐ NO

6.5.C.2.a.

a. A legible copy of the manifest for which the generator does not have confirmation of the delivery; and ☒ YES ☐ NO

6.5.C.2.b.

b. A cover letter explaining the efforts taken to locate the shipment? ☒ YES ☐ NO

6.4.E.1.

6. Is hazardous waste being accumulated on-site for less than 90 days? If yes, ☒ YES ☐ NO

6.4.E.1.a.

a. Is the waste stored in containers? In tanks? ☒ YES ☐ NO  
☒ YES ☐ NO  
(If answer to either question is yes, fill out appropriate checklists. If both answers are no, interim status or a TSD permit is required - fill out facility checklist to determine compliance status).

6.4.E.1.b.

b. Is the date that accumulation begins clearly marked and visible for inspection on each container? ☒ YES ☐ NO

6.4.E.1.c.

c. Is each container and tank clearly marked with the words "Hazardous Waste"? ☒ YES ☐ NO

6.4.E.1.e.

d. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas? ☒ YES ☐ NO

6.4.E.2.

7. Does the generator accumulate (store) hazardous waste on-site for greater than 90 days? If yes, interim status or a TSD permit is required - fill out facility checklist to determine compliance status. YES ☒ NO

6.4.E.1.d.

8. Does the generator record inspections ☒ YES ☐ NO

9.1.F.4. in an inspection log?

6.4.E.1.d.  
9.1.G.1.

9. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ YES ☐ NO

9.1.G.2.

10. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? ☒ YES ☐ NO

9.1.G.3.

11. Do personnel participate in an annual review of the initial training? ☒ YES ☐ NO

12. Does the facility maintain a record of the following:

9.1.G.4.a.

a. job titles for each position at the facility related to hazardous waste management; and ☒ YES ☐ NO

9.1.G.4.a.

b. the name of the employee filling each job; and ☒ YES ☐ NO

9.1.G.4.b

c. a written job description for each position in (a); and ☒ YES ☐ NO

9.1.G.4.c.

d. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a); and ☒ YES ☐ NO

9.1.G.4.d.

e. Records that document that the training or job experience required above has been given to, and completed by facility personnel? ☒ YES ☐ NO

9.2.B.

9.2.D:

13. At the facility, is the following equipment installed:

- 9.2.B.1. a. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion? ☒ YES NO
- 9.2.B.2. b. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.? ☒ YES NO  
Telephone
- 9.2.B.3. c. Portable fire extinguishers, fire control, and decontamination equipment?; and ☒ YES NO
- 9.2.B.4. d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ YES NO
- 9.2.C. 14. Is a record of tests and inspections of items 13 a-d maintained at the facility? ☒ YES NO
- 9.2.E. 15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies? ☒ YES NO
- 6.4.E.1.d.  
9.3. 16. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? ☒ YES NO
- 9.3.B. 17. Does the contingency plan contain the following elements:



9.3.E.(1,2).

a. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?

YES (NO) ✓

9.3.B.3.

b. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?

YES (NO) ✓

9.3.B.4.

c. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator.

YES (NO) ✓

Name Raymond C. Sullivan

Title Industrial Manager

Telephone 703-451-5221

9.3.B.5.

d. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility?

YES (NO) ✓

9.3.B.6.

e. Does this list specify the location and physical description of each item on the list and a brief outline of its capabilities?

YES (NO) ✓

9.3.B.6.

f. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary?

YES (NO) ✓

9.3.C.

g. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams?  
List:

YES (NO) ✓

Fairfax County Fire Department

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9.3.C. h. Is there documentation to indicate the personnel listed above received the contingency plan? YES ☒ NO

9.3.F.(9,10). i. Has the contingency plan ever been implemented? YES ☒ NO

If yes, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed? YES NO

6.4.E.3.a. 18. Does the generator have satellite accumulation areas? If yes, YES ☒ NO

a. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate? YES ☒ NO

6.4.E.3.a.(1) 9.8.B. b. Are the containers in good condition? YES ☒ NO

6.4.E.3.a.(1) 9.8.C. c. Are the containers compatible with the waste? YES ☒ NO

6.4.E.3.a.(1) 9.8.D.1. d. Are the containers kept closed except as necessary to add or remove waste? YES ☒ NO

6.4.E.3.a.(2) e. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? YES ☒ NO

6.5.E.3.b. f. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes, YES ☒ NO

(1) Has the generator marked the excess amount with the date the excess amount began accumulating? YES NO N/A

(2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas listed in question 5 on this checklist? YES NO N/A  
Namely, has he notified the

Executive Director about the location of the accumulation area?

If no, what has the generator chosen to do? \_\_\_\_\_

6.5.A.

19. Does the generator retain copies of all manifests, annual reports, and test results for at least three years?

☒ YES ☐ NO

6.5.B.

20. Has the facility submitted an annual report for the preceding calendar year?

YES ☒ NO ✓

21. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

MARCH 1991

INSPECTION CHECKLIST FOR  
THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: D.C. Dept. of Corrections  
Address: Industries Division, Box 730  
Lorton, VA 22079  
EPA ID Number: VAD980830988  
Facility Inspection Representative: Raymond C. Sullivan  
Title: Industrial Manager  
Telephone Number: (703) 643-2142  
Inspector's Name: Richard E. Fox, Jr  
Title: Chemist  
Date of Inspection: 1/22/92

Va. Hazardous  
Waste Reg.

9.8.B.

1. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

☒ YES NO

If no, list the storage/accumulation areas where there are problems and the type of problem:

Location

Problem

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9.8.C.

2. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?

☒ YES NO

- 6.4.E.b 3. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? ☒ YES NO
- 6.4.E.c. 4. Is the container labeled or marked clearly with the words "Hazardous Waste"? ☒ YES NO
- 9.8.D.1. 5. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? ☒ YES NO
- If no, list the locations where open containers are found. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- 9.8.E. 6. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly? ☒ YES NO
- 9.1.F.2.a. 7. For large quantity generators and  
9.1.F.4. TSD facilities only:  
6.4.E.1.d. Is an inspection log maintained? ☒ YES NO
- 9.8.F. 8. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? ☒ YES NO
- 9.8.G.1. 9. Are incompatible wastes placed in separate containers? ☒ YES NO
- 9.8.G.3. 10. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices? ☒ YES NO

6.4.E.3.a.

11. For satellite accumulation areas:

a. Is the area at or near the point the point of generation? (If no, the area is not a satellite accumulation area, and inspection and notification requirements are applicable).

YES NO

b. Are there more than 55 gallons of any one type of waste present in the area?

YES NO

If yes,

6.4.E.3.b

c. Has the amount in excess of 55 gallons been in the satellite accumulation area longer than 3 days?

YES NO

If yes,

6.4.E.3.b.

6.4.E.1.b.

d. Has the company notified the Department about the location of the accumulation area?

YES NO ✓

10. Comments:

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November 1991

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF  
LAND-RESTRICTED WASTE MANAGEMENT

Name of Facility: D. C. Dept of Corrections

Address: Industries Division, Box 730

Lorton, VA 22079

EPA ID Number: VAD 980830988

Facility Representative: Raymond C. Sullivan

Title: Industrial Manager

Telephone Number: (703) 643-2142

Inspector's Name: Richard E. Fox, Jr.

Title: Chemist

Date of Inspection: 11/22/92

1. Does the facility generate transport, or  
treat, store or dispose any land-restricted wastes?  
(See Attachment)

YES NO

If yes, please list:

F002  
F003 F405  
F001

15.1.A.3.

2. Is land disposal of wastes listed in 1 above  
occurring?

YES NO

If yes, then:

15.1.A.3.a.

a. Has the facility been granted an  
extension to the effective date for land  
restrictions applicable to its restricted  
waste? (See effective dates listed in  
Attachment)

N/A  
YES NO

15.1.A.3.b.

b. Has the facility been granted an  
exemption from prohibition pursuant to a  
petition for those land-restricted wastes and  
units covered by the petition?

N/A  
YES NO

15.1.A.3.c.

c. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste, per month?

N/A  
YES NO

15.1.E.

d. Has the owner/operator submitted an application for a case-by-case extension to the effective date of any applicable restriction?

N/A  
YES NO

15.1.F.

e. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?

N/A  
YES NO

15.1.C.

3. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?

YES NO

15.1.D.1.

4. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments?

YES NO

(If no, go to number 6)

[If yes, complete surface impoundment checklist]

[Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.]

If yes, does the facility meet the following requirements:

15.1.D.1.b

a. Are the residues of the treatment analyzed as specified in VHWMR Sections 15.1.G. or 15.3.C. to determine if they meet the applicable treatment standards or VHWMR Section 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR Section 15.3?

N/A  
YES NO

15.1.G.

15.3.C.

15.4.

15.3.

15.1.D.1.c.

b. Has the owner or operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?

YES NO

9.10.B.1.

10.10.B.3.

15.1.D.1.c.

c. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR Section 10.5.?

YES NO

10.5.



15.1.D.1.d.

d. Has the owner or operator submitted a written certification to the Executive Director that items a-c have been met which states,

N/A  
YES NO

"I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."?

15.1.D.1.d.

e. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?

YES NO

15.1.G.1.

5. Has the owner/operator determined if his waste is a land restricted waste?

(YES) NO

15.1.G.1a.

6. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied **each** shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?

(YES) NO

Did the notification include the following information:

15.1.G.1.b.1a

- EPA Hazardous Waste Number;

(YES) NO

15.1.G.1.b.1b

- The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.C;

(YES) NO

15.1.G.1.b.1c

- The manifest number associated with the shipment of waste;

(YES) NO

15.1.G.1.b.1d

- Waste analysis data, where available?

(YES) NO

15.1.G.1.b.

7. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied **each** shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR Section 15.3.C?

N/A  
YES NO

a. Did the notification contain the following information:

		N/A	
15.1.G.1.b.1a	- EPA Hazardous Waste Number;	YES	NO
15.1.G.1.b.1b	- The corresponding treatment standards and all applicable prohibitions;	YES	NO
15.1.G.1.b.1c	- The manifest number associated with the shipment of waste; and	YES	NO
15.1.G.1.b.1d	- Waste analysis data, where available?	YES	NO
15.1.G.1.b.2.	b. Was the certification signed by an authorized representative, and did it state the following:  "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR Section 15.4. and all applicable prohibitions set forth in VHWMR Section 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."	YES	NO
15.1.G.1.c.	8. For restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?	YES	NO
15.1.G.f.	9. Does the generator retain on-site copies of all notices, certification, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	YES	NO
15.1.G.2.	10. <u>For Treatment Facilities ONLY</u> : Has the owner or operator of the treatment facility tested the treatment residues or extract to assure that they shall meet the applicable treatment standards?	YES	NO
15.1.G.2.	a. Has this testing been done at the frequency stated in the waste analysis plan?	YES	NO



15.1.G.2.a.  
15.1.G.1.a.

b. For treatment residuals which do not meet the applicable treatment standards, has the facility filed the notification in 8 above as a generator to any subsequent treatment facilities?

N/A  
YES NO  
YES NO  
↓

15.1.G.2.b.

c. For treated wastes meeting the applicable treatment standards, or for wastes not subject to any treatment standards, has a certification been signed and accompanies each shipment stating:

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in VHWMR Sections 15.4 and 15.3.C. without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

OR (for wastes with treatment standards expressed as technologies)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of VHWMR Section 15.4.C. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

15.5.

11. Is the generator storing land restricted waste? (For one year storage only)

YES (NO)

15.5.1.a.

a. If yes, is the storage onsite solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facility proper recovery, treatment or disposal?

N/A  
YES NO

## Attachment - Land Restricted Wastes

<u>Waste</u>	<u>Effective Date</u>
F001 - F005	11/08/86
F001 - F005 from Small Quantity Generators, generated via RCRA corrective actions or CERCLA response actions, and hazardous wastes containing less than 1% total solvent constituents	11/08/88
F001 - F005 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90

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### California Listed Wastes

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 ppm (mg/l). 7/8/87

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing any of the following metals or compounds of these metals at concentrations greater than or equal to those specified below:

Arsenic (as As)	500 mg/l
Cadmium (as Cd)	100 mg/l
Chromium (as Cr VI)	500 mg/l
Lead (as Pb)	500 mg/l
Mercury (as Hg)	20 mg/l
Nickel (as Ni)	134 mg/l
Selenium (as Se)	100 mg/l
Thallium (as Tl)	130 mg/l

Liquid hazardous wastes having a pH less than or equal to 2.0. 7/8/87

Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. 7/8/87

Liquid hazardous wastes, primarily water, containing greater than or equal to 1000 mg/l HOCs, but less than or equal to 10,000 mg/l HOCs. 7/8/87

California waste contaminated soil and debris resulting from RCRA corrective actions or CERCLA response actions. 11/8/90

Liquid hazardous wastes, not primarily water, containing greater than or equal to 1000 mg/l HOCs. 11/8/88

Nonliquid (non-RCRA/CERCLA) hazardous wastes containing greater than or equal to 1000 mg/l HOCs. 11/8/88

Effective Dates of Land Disposal Restricted Wastes

<u>Waste Code</u>	<u>Waste Category</u>	<u>Effective Date</u>
D001	All	Aug. 8, 1990
D002	All	Aug. 8, 1990
D003	All	Aug. 8, 1990
D004	Inorganic Solid Debris	May 8, 1992
D004	Nonwastewater	May 8, 1992
D004	Wastewater	Aug. 8, 1990
D005	Inorganic solid debris	May 8, 1992
D005	All others	Aug. 8, 1990
D006	Inorganic solid debris	May 8, 1992
D006	All others	Aug. 8, 1990
D007	Inorganic solid debris	May 8, 1992
D007	All others	Aug. 8, 1990
D008	Inorganic solid debris	May 8, 1992
D008	Lead acid batteries	May 8, 1992
D008	All others	Aug. 8, 1990
D009	Inorganic solid debris	May 8, 1992
D009	High mercury nonwastewater	May 8, 1992
D009	Low mercury nonwastewater	May 8, 1992
D009	All others	Aug. 8, 1990
D010	Inorganic solid debris	May 8, 1992
D010	All others	Aug. 8, 1990
D011	Inorganic solid debris	May 8, 1992
D011	All others	Aug. 8, 1990
D012	All	Aug. 8, 1990
D013	All	Aug. 8, 1990
D014	All	Aug. 8, 1990
D015	All	Aug. 8, 1990
D016	All	Aug. 8, 1990
D017	All	Aug. 8, 1990
F002	All	Aug. 8, 1990
F005	All	Aug. 8, 1990
F006	Wastewater	Aug. 8, 1990
F006	Nonwastewater	Aug. 8, 1988
F006 (cyan.)	Nonwastewater	July 8, 1989
F007	All	July 8, 1989
F008	All	July 8, 1989
F009	All	July 8, 1989
F010	Soil & debris	June 8, 1991
F010	All others	June 8, 1989
F011	All	July 8, 1989
F012	All	July 8, 1989
F019	All	Aug. 8, 1990
F020	Soil & debris	Nov. 8, 1990
F020	All others	Nov. 8, 1988
F021	Soil & debris	Nov. 8, 1990
F021	All others	Nov. 8, 1988
F022	Soil & debris	Nov. 8, 1990
F022	All others	Nov. 8, 1988
F023	Soil & debris	Nov. 8, 1990
F023	All others	Nov. 8, 1988
F024	Soil & debris	June 8, 1991
F024 metals	Nonwastewater	Aug. 8, 1990
F024 dioxins/ furans	All	Aug. 8, 1990
F024	All others	June 8, 1989
F025	All	Aug. 8, 1990
F026	Soil & debris	Nov. 8, 1990
F026	All others	Nov. 8, 1988
F027	Soil and debris	Nov. 8, 1990
F027	All others	Nov. 8, 1988
F028	Soil and debris	Nov. 8, 1990
F028	All others	Nov. 8, 1988
F039	Wastewater	Aug. 8, 1990
F039	Nonwastewater	May 8, 1992
K001	Soil & debris	Aug. 8, 1988
K001 lead/ organics	All	Aug. 8, 1990
K001	All others	Aug. 8, 1990
K002	All	Aug. 8, 1990
K003	All	Aug. 8, 1990
K004	All	Aug. 8, 1990

K005	All	Aug. 8, 1990
K006	All	Aug. 8, 1990
K007	All	Aug. 8, 1990
K008	All	Aug. 8, 1990
K009	Soil & debris	June 8, 1991
K009	All others	June 8, 1989
K010	Soil & debris	June 8, 1991
K010	All others	June 8, 1989
K011	Wastewater	Aug. 8, 1990
K011	Nonwastewater	June 8, 1989
K011	Soil & debris	June 8, 1991
K013	Wastewater	Aug. 8, 1990
K013	Nonwastewater	June 8, 1989
K013	Soil & debris	June 8, 1991
K014	Wastewater	Aug. 8, 1990
K014	Nonwastewater	June 8, 1989
K014	Soil & debris	June 8, 1991
K015	Wastewater	Aug. 8, 1988
K015	Nonwastewater	Aug. 8, 1990
K016	Soil & debris	Aug. 8, 1990
K017	All others	Aug. 8, 1990
K018	Soil & debris	Aug. 8, 1990
K018	All others	Aug. 8, 1988
K019	Soil & debris	Aug. 8, 1990
K019	All others	Aug. 8, 1988
K020	Soil & debris	Aug. 8, 1990
K020	All others	Aug. 8, 1988
K021	All	Aug. 8, 1990
K022	Wastewater	Aug. 8, 1990
K022	nonwastewater	Aug. 8, 1988
K022	Soil & debris	Aug. 8, 1990
K023	Soil & debris	June 8, 1991
K023	All others	June 8, 1989
K024	Soil & debris	Aug. 8, 1990
K024	All others	Aug. 8, 1988
K025	All	Aug. 8, 1990
K026	All	Aug. 8, 1990
K027	Soil & debris	June 8, 1991
K027	All others	June 8, 1989
K028	Soil & debris	June 8, 1991
K028 metals	Nonwastewater	Aug. 8, 1990
K028	All others	June 8, 1989
K029	Wastewater	Aug. 8, 1990
K029	nonwastewater	June 8, 1989
K029	Soil & debris	June 8, 1991
K030	Soil & debris	Aug. 8, 1990
K030	All others	Aug. 8, 1988
K031	Wastewater	Aug. 8, 1990
K031	Nonwastewater	May 8, 1992
K032	All	Aug. 8, 1990
K033	All	Aug. 8, 1990
K034	All	Aug. 8, 1990
K035	All	Aug. 8, 1990
K036	All	Aug. 8, 1990
K037	Soil & debris	Aug. 8, 1990
K037	Wastewater	Aug. 8, 1990
K037	All others	Aug. 8, 1988
K038	Soil & debris	June 8, 1991
K038	All others	June 8, 1989
K039	Soil & debris	June 8, 1991
K039	All others	June 8, 1989
K040	Soil & debris	June 8, 1991
K040	All others	June 8, 1989
K041	All	Aug. 8, 1990
K042	All	Aug. 8, 1990
K043	Soil & debris	Aug. 8, 1988
K043	All others	Aug. 8, 1990
K044	All	Aug. 8, 1990
K045	All	Aug. 8, 1990
K046	Nonreactive nonwastewater	Aug. 8, 1988
K046	All others	Aug. 8, 1990
K047	All	Aug. 8, 1990
K048	Wastewater	Aug. 8, 1990
K048	Nonwastewater	Nov. 8, 1990
K049	Wastewater	Aug. 8, 1990
K049	nonwastewater	Nov. 8, 1990

K050	Wastewater	Aug. 8, 1990
K050	Nonwastewater	Nov. 8, 1990
K051	Wastewater	Aug. 8, 1990
K051	Nonwastewater	Nov. 8, 1990
K052	Wastewater	Aug. 8, 1990
K052	Nonwastewater	Nov. 8, 1990
K060	All	Aug. 8, 1990
K061	Wastewater	Aug. 8, 1990
K061	Nonwastewater	Aug. 8, 1988
K062	All	Aug. 8, 1988
K069	All	Aug. 8, 1990
K073	All	Aug. 8, 1990
K083	All	Aug. 8, 1990
K084	Wastewater	May 8, 1992
K084	Nonwastewater	Aug. 8, 1990
K085	All	Aug. 8, 1990
K086	All	Aug. 8, 1990
K087	Soil & debris	Aug. 8, 1990
K087	All others	Aug. 8, 1988
K093	Soil and debris	June 8, 1991
K093	All others	June 8, 1989
K094	Soil & debris	June 8, 1991
K094	All others	June 8, 1989
K095	Wastewater	Aug. 8, 1990
K095	Nonwastewater	June 8, 1989
K095	Soil & debris	June 8, 1991
K096	Wastewater	Aug. 8, 1990
K096	Nonwastewater	June 8, 1989
K096	Soil & debris	June 8, 1991
K097	All	Aug. 8, 1990
K098	All	Aug. 8, 1990
K099	All	Aug. 8, 1988
K100	All	Aug. 8, 1990
K101	Wastewater	Aug. 8, 1988
K101	nonwastewater	May 8, 1992
K102	Wastewater	Aug. 8, 1988
K102	Nonwastewater	May 8, 1992
K103	Soil & debris	Aug. 8, 1990
K103	All others	Aug. 8, 1988
K104	Soil and debris	Aug. 8, 1990
K014	All others	Aug. 8, 1988
K105	All	Aug. 8, 1990
K106	High mercury nonwastewater	May 8, 1992
K106	Low mercury nonwastewater	May 8, 1992
K106	All others	Aug. 8, 1990
K113	Soil & debris	June 8, 1991
K113	All others	June 8, 1989
K114	Soil & debris	June 8, 1991
K114	All others	June 8, 1989
K115	Soil & debris	June 8, 1991
K115	All others	June 8, 1989
K116	Soil & debris	June 8, 1991
K116	All others	June 8, 1989

P001	All	Aug. 8, 1990
P002	All	Aug. 8, 1990
P003	All	Aug. 8, 1990
P004	All	Aug. 8, 1990
P005	All	Aug. 8, 1990
P006	All	Aug. 8, 1990
P007	All	Aug. 8, 1990
P008	All	Aug. 8, 1990
P009	All	Aug. 8, 1990
P010	Wastewater	Aug. 8, 1990
P010	Nonwastewater	May 8, 1992
P011	Wastewater	Aug. 8, 1990
P011	Nonwastewater	May 8, 1992
P012	Wastewater	Aug. 8, 1990
P012	Nonwastewater	May 8, 1992
P013	All	Aug. 8, 1990
P014	All	Aug. 8, 1990
P015	All	Aug. 8, 1990
P016	All	Aug. 8, 1990
P017	All	Aug. 8, 1990
P018	All	Aug. 8, 1990
P020	All	Aug. 8, 1990
P021	All	June 8, 1989
P022	All	Aug. 8, 1990
P023	All	Aug. 8, 1990
P024	All	Aug. 8, 1990
P026	All	Aug. 8, 1990
P027	All	Aug. 8, 1990
P028	All	Aug. 8, 1990
P029	All	June 8, 1989
P030	All	June 8, 1989
P031	All	Aug. 8, 1990
P033	All	Aug. 8, 1990
P034	All	Aug. 8, 1990
P036	Wastewater	Aug. 8, 1990
P036	Nonwastewater	May 8, 1992
P037	All	Aug. 8, 1990
P038	Wastewater	Aug. 8, 1990
P038	Nonwastewater	May 8, 1992
P039	Soil & debris	June 8, 1991
P039	All others	June 8, 1989
P040	Soil and debris	June 8, 1991
P040	All others	June 8, 1989
P041	Soil land debris	June 8, 1991
P041	All others	June 8, 1989
P042	All	Aug. 8, 1990
P043	Soil & debris	June 8, 1991
P043	All others	June 8, 1989
P044	Soil & debris	June 8, 1991
P044	All others	June 8, 1989
P045	All	Aug. 8, 1990
P046	All	Aug. 8, 1990
P047	All	Aug. 8, 1990
P048	All	Aug. 8, 1990
P049	All	Aug. 8, 1990
P050	All	Aug. 8, 1990
P051	All	Aug. 8, 1990
P054	All	Aug. 8, 1990
P056	All	Aug. 8, 1990
P057	All	Aug. 8, 1990
P058	All	Aug. 8, 1990
P059	All	Aug. 8, 1990
P060	All	Aug. 8, 1990
P062	Soil & debris	June 8, 1991
P062	All others	June 8, 1989
P063	All	June 8, 1989
P064	All	Aug. 8, 1990
P065	High mercury nonwastewater	May 8, 1992
P065	Low mercury nonwastewater	May 8, 1992
P065	All others	Aug. 8, 1990
P066	All	Aug. 8, 1990
P067	All	Aug. 8, 1990
P068	All	Aug. 8, 1990
P069	All	Aug. 8, 1990
P070	All	Aug. 8, 1990
P071	Soil & debris	June 8, 1991
P071	All others	June 8, 1989



P072	All	Aug. 8, 1990
P073	All	Aug. 8, 1990
P074	All	June 8, 1989
P075	All	Aug. 8, 1990
P076	All	Aug. 8, 1990
P077	All	Aug. 8, 1990
P078	All	Aug. 8, 1990
P081	All	Aug. 8, 1990
P082	All	Aug. 8, 1990
P084	All	Aug. 8, 1990
P085	Soil & debris	June 8, 1991
P085	All others	June 8, 1989
P087	All	May 8, 1992
P088	All	Aug. 8, 1990
P089	Soil & debris	June 8, 1991
P089	All others	June 8, 1989
P092	High mercury nonwastewater	May 8, 1992
P092	Low mercury nonwastewater	May 8, 1992
P092	All others	Aug. 8, 1990
P093	Soil & debris	May 8, 1992
P093	All others	Aug. 8, 1990
P094	Soil & debris	June 8, 1991
P094	All others	June 8, 1989
P095	Soil & debris	May 8, 1992
P095	All others	Aug. 8, 1990
P096	All	Aug. 8, 1990
P097	Soil & debris	June 8, 1991
P097	All others	June 8, 1989
P098	All	June 8, 1989
P099 silver	Wastewater	Aug. 8, 1990
P099 cyanides	Wastewater	June 8, 1989
P099 cyanides/ silver	Nonwastewater	June 8, 1989
P101	All	Aug. 8, 1990
P102	All	Aug. 8, 1990
P103	All	Aug. 8, 1990
P104 silver	Wastewater	Aug. 8, 1990
P104 cyanides	Wastewater	June 8, 1989
P104 cyanides/ silver	Nonwastewater	June 8, 1989
P105	All	Aug. 8, 1990
P106	All	June 8, 1989
P108	Soil & debris	May 8, 1992
P108	All others	Aug. 8, 1990
P109	Soil and debris	June 8, 1991
P109	All others	June 8, 1989
P110	All	Aug. 8, 1990
P111	Soil & debris	June 8, 1991
P111	All others	June 8, 1989
P112	All	Aug. 8, 1990
P113	All	Aug. 8, 1990
P114	All	Aug. 8, 1990
P115	All	Aug. 8, 1990
P116	Soil & debris	May 8, 1992
P116	All others	Aug. 8, 1990
P118	Soil & debris	May 8, 1992
P118	All others	Aug. 8, 1990
P119	All	Aug. 8, 1990
P120	All	Aug. 8, 1990
P121	All	June 8, 1989
P122	All	Aug. 8, 1990
P123	All	Aug. 8, 1990
U001	All	Aug. 8, 1990
U002	All	Aug. 8, 1990
U003	Soil & debris	May 8, 1992
U003	All others	Aug. 8, 1990
U004	All	Aug. 8, 1990
U005	All	Aug. 8, 1990
U006	Soil & debris	May 8, 1992
U006	All others	Aug. 8, 1990
U007	Soil & debris	May 8, 1992
U007	All others	Aug. 8, 1990
U008	All	Aug. 8, 1990
U009	All	Aug. 8, 1990
U010	Soil & debris	May 8, 1992
U010	All others	Aug. 8, 1990

U011	Soil & debris	May 8, 1992
U011	All others	Aug. 8, 1990
U012	All	Aug. 8, 1990
U014	Soil & debris	May 8, 1992
U014	All others	Aug. 8, 1990
U015	Soil & debris	May 8, 1992
U015	All others	Aug. 8, 1990
U016	All	Aug. 8, 1990
U017	Soil & debris	May 8, 1992
U017	All others	Aug. 3, 1990
U018	All	Aug. 8, 1990
U019	All	Aug. 8, 1990
U020	Soil & debris	May 8, 1992
U020	All others	Aug. 8, 1990
U021	Soil & debris	May 8, 1992
U021	All others	Aug. 8, 1990
U022	All	Aug. 8, 1990
U023	All	Aug. 8, 1990
U024	All	Aug. 8, 1990
U025	All	Aug. 8, 1990
U026	Soil & debris	May 8, 1992
U026	All others	Aug. 8, 1990
U027	All	Aug. 8, 1990
U028	Soil & debris	June 8, 1991
U028	All others	June 8, 1989
U029	All	Aug. 8, 1990
U030	All	Aug. 8, 1990
U031	All	Aug. 8, 1990
U032	All	Aug. 8, 1990
U033	Soil & debris	May 8, 1992
U033	All others	Aug. 8, 1990
U034	Soil & debris	May 8, 1992
U034	All others	Aug. 8, 1990
U035	Soil & debris	May 8, 1992
U035	All others	Aug. 8, 1990
U036	All	Aug. 8, 1990
U037	All	Aug. 8, 1990
U038	Soil & debris	May 8, 1992
U038	All others	Aug. 8, 1990
U039	All	Aug. 8, 1990
U041	Soil & debris	May 8, 1992
U041	All others	Aug. 8, 1990
U042	Soil & debris	May 8, 1992
U042	All others	Aug. 8, 1990
U043	All	Aug. 8, 1990
U044	All	Aug. 8, 1990
U045	All	Aug. 8, 1990
U046	Soil & debris	May 8, 1992
U046	All others	Aug. 8, 1990
U047	All	Aug. 8, 1990
U048	All	Aug. 8, 1990
U049	Soil & debris	May 8, 1992
U049	All others	Aug. 8, 1990
U050	All	Aug. 8, 1990
U051	All	Aug. 8, 1990
U052	All	Aug. 8, 1990
U053	All	Aug. 8, 1990
U055	All	Aug. 8, 1990
U056	All	Aug. 8, 1990
U057	All	Aug. 8, 1990
U058	Soil & debris	June 8, 1992
U058	All others	June 8, 1989
U059	Soil & debris	May 8, 1992
U059	All others	Aug. 8, 1990
U060	Soil & debris	May 8, 1992
U060	All others	Aug. 8, 1990
U061	Soil & debris	May 8, 1992
U061	All others	Aug. 8, 1990
U062	Soil & debris	May 8, 1992
U062	All others	Aug. 8, 1990
U063	All	Aug. 8, 1990
U064	All	Aug. 8, 1990
U066	All	Aug. 8, 1990
U067	All	Aug. 8, 1990
U068	All	Aug. 8, 1990
U069	Soil & debris	June 8, 1991

U069	All othres	June 8, 1989
U070	All	Aug. 8, 1990
U071	All	Aug. 8, 1990
U072	All	Aug. 8, 1990
U073	Soil & debris	May 8, 1992
U073	All others	Aug. 8, 1990
U074	Soil & debris	May 8, 1992
U074	All others	Aug. 8, 1990
U075	All	Aug. 8, 1990
U076	All	Aug. 8, 1990
U077	All	Aug. 8, 1990
U078	All	Aug. 8, 1990
U079	All	Aug. 8, 1990
U080	All	Aug. 8, 1990
U081	All	Aug. 8, 1990
U082	All	Aug. 8, 1990
U083	All	Aug. 8, 1990
U084	All	Aug. 8, 1990
U085	All	Aug. 8, 1990
U086	All	Aug. 8, 1990
U087	Soil & debris	June 8, 1991
U087	All others	June 8, 1989
U088	Soil & debris	June 8, 1991
U088	All others	June 8, 1989
U089	All	Aug. 8, 1990
U090	All	Aug. 8, 1990
U091	Soil & debris	May 8, 1992
U091	All others	Aug. 8, 1990
U092	Soil & debris	May 8, 1992
U092	All others	Aug. 8, 1990
U093	Soil & debris	May 8, 1992
U093	All others	Aug. 8, 1990
U094	All	Aug. 8, 1990
U095	Soil & debris	May 8, 1992
U095	All others	Aug. 8, 1990
U096	All	Aug. 8, 1990
U097	Soil & debris	May 8, 1992
U097	All others	Aug. 8, 1990
U098	All	Aug. 8, 1990
U099	All	Aug. 8, 1990
U101	All	Aug. 8, 1990
U102	Soil & debris	June 8, 1991
U102	All others	June 8, 1989
U103	All	Aug. 8, 1990
U105	All	Aug. 8, 1990
U106	All	Aug. 8, 1990
U107	Soil & debris	June 8, 1991
U107	All others	June 8, 1989
U108	All	Aug. 8, 1990
U019	All	Aug. 8, 1990
U110	Soil & debris	May 8, 1992
U110	All others	Aug. 8, 1990
U111	All	Aug. 8, 1990
U112	All	Aug. 8, 1990
U113	All	Aug. 8, 1990
U114	Soil & debris	May 8, 1992
U114	All others	Aug. 8, 1990
U115	All	Aug. 8, 1990
U116	Soil & debris	May 8, 1992
U116	All others	Aug. 8, 1990
U117	All	Aug. 8, 1990
U118	All	Aug. 8, 1990
U119	Soil & debris	May 8, 1992
U119	All others	Aug. 8, 1990
U120	All	Aug. 8, 1990
U121	All	Aug. 8, 1990
U122	All	Aug. 8, 1990
U123	All	Aug. 8, 1990
U124	All	Aug. 8, 1990
U125	All	Aug. 8, 1990
U126	All	Aug. 8, 1990
U127	All	Aug. 8, 1990
U128	All	Aug. 8, 1990
U129	All	Aug. 8, 1990
U130	Soil & debris	May 8, 1992
U130	All others	Aug. 8, 1990
U131	All	Aug. 8, 1990

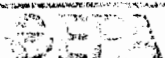
U132  
U132  
U133  
U134  
U135

Soil & debris  
All others  
All  
All  
All

May 8, 1992  
Aug. 8, 1990  
Aug. 8, 1990  
Aug. 8, 1990  
Aug. 8, 1990

U136	Wastewater	Aug. 8, 1990
U136	nonwastewater	May 8, 1992
U137	All	Aug. 8, 1990
U138	All	Aug. 8, 1990
U140	All	Aug. 8, 1990
U141	All	Aug. 8, 1990
U142	All	Aug. 8, 1990
U143	Soil & debris	May 8, 1992
U143	All others	Aug. 8, 1990
U144	All	Aug. 8, 1990
U145	All	Aug. 8, 1990
U146	All	Aug. 8, 1990
U147	All	Aug. 8, 1990
U148	Soil & debris	May 8, 1992
U148	All others	Aug. 8, 1990
U149	Soil & debris	May 8, 1992
U149	All others	Aug. 8, 1990
U150	Soil & debris	May 8, 1992
U150	All others	Aug. 8, 1990
U151	High mercury nonwastewater	May 8, 1992
U151	Low mercury nonwastewater	May 8, 1992
U151	Soil & debris	May 8, 1992
U151	All others	Aug. 8, 1990
U152	All	Aug. 8, 1990
U153	Soil & debris	May 8, 1992
U153	All others	Aug. 8, 1990
U154	All	Aug. 8, 1990
U155	All	Aug. 8, 1990
U156	Soil and debris	May 8, 1992
U156	All others	Aug. 8, 1990
U157	All	Aug. 8, 1990
U158	All	Aug. 8, 1990
U159	All	Aug. 8, 1990
U160	All	Aug. 8, 1990
U161	All	Aug. 8, 1990
U162	All	Aug. 8, 1990
U163	Soil and debris	May 8, 1992
U163	All others	Aug. 8, 1990
U164	Soil and debris	May 8, 1992
U164	All others	Aug. 8, 1990
U165	All	Aug. 8, 1990
U166	All	Aug. 8, 1990
U167	Soil and debris	May 8, 1992
U167	All others	Aug. 8, 1990
U168	Soil and debris	May 8, 1992
U168	All others	Aug. 8, 1990
U169	All	Aug. 8, 1990
U170	All	Aug. 8, 1990
U171	Soil and debris	May 8, 1992
U171	All others	Aug. 8, 1990
U172	All	Aug. 8, 1990
U173	Soil and debris	May 8, 1992
U173	All others	Aug. 8, 1990
U174	All	Aug. 8, 1990
U176	Soil and debris	May 8, 1992
U176	All others	Aug. 8, 1990
U177	Soil and debris	May 8, 1992
U177	All others	Aug. 8, 1990
U178	Soil & debris	May 8, 1992
U178	All others	Aug. 8, 1990
U179	All	Aug. 8, 1990
U180	All	Aug. 8, 1990
U181	All	Aug. 8, 1990
U182	All	Aug. 8, 1990
U183	All	Aug. 8, 1990
U184	Soil & debris	May 8, 1992
U184	All others	Aug. 8, 1990
U185	All	Aug. 8, 1990
U186	All	Aug. 8, 1990
U187	All	Aug. 8, 1990
U188	All	Aug. 8, 1990
U189	All	Aug. 8, 1990
U190	Soil & debris	June 8, 1991
U190	All others	June 8, 1989
U191	Soil and debris	May 8, 1992
U191	All others	Aug. 8, 1990
U192	All	Aug. 8, 1990

Please print or type with ELITE type 112 characters/line in the unshaded areas only.



U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprint label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprint label, complete all items. "Installation" means single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law.

INSTALLATION'S EPA I.D. NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE  
**RECEIVED**  
Facilities Management Section  
FEB 6 1984

FOR OFFICIAL USE ONLY

U.S. Region III  
COMMENTS

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

INSTALLATION'S EPA I.D. NUMBER															APPROVED					DATE RECEIVED (yr., mo., day)				
F VAD980830988																				840207				

I. NAME OF INSTALLATION																								
DC DEPARTMENT OF CORRECTIONS																								

II. INSTALLATION MAILING ADDRESS																								
STREET OR P.O. BOX																								
3 INDUSTRIAL DIVISION PO BOX 18																								
CITY OR TOWN																				ST.		ZIP CODE		
LORTON																				VA		22079		

III. LOCATION OF INSTALLATION																								
STREET OR ROUTE NUMBER																								
5 SAME AS ABOVE																								
CITY OR TOWN																				ST.		ZIP CODE		

IV. INSTALLATION CONTACT																								
NAME AND TITLE (last, first, & job title)																				PHONE NO. (area code & no.)				
STRICKLAND MARION ASST. DIR.																				703-643-2142				

V. OWNERSHIP																								
A. NAME OF INSTALLATION'S LEGAL OWNER																								
8 DC GOVERNMENT																								

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)															VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))									
F = FEDERAL M = NON-FEDERAL															<input checked="" type="checkbox"/> A. GENERATION <input type="checkbox"/> B. TRANSPORTATION (complete item VII) <input type="checkbox"/> C. TREAT/STORE/DISPOSE <input type="checkbox"/> D. UNDERGROUND INJECTION									

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))																								
<input type="checkbox"/> A. AIR					<input type="checkbox"/> B. RAIL					<input type="checkbox"/> C. HIGHWAY					<input type="checkbox"/> D. WATER					<input type="checkbox"/> E. OTHER (specify)				

VIII. FIRST OR SUBSEQUENT NOTIFICATION																								
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.																								

<input checked="" type="checkbox"/> A. FIRST NOTIFICATION <input type="checkbox"/> B. SUBSEQUENT NOTIFICATION (complete item C)																								
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

C. INSTALLATION'S EPA I.D. NO.																								

1	2	3	4	5	6
F 0 0 2					
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24
7	8	9	10	11	12
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24

	13		14		15		16		17		18
23	-	26	23	-	26	23	-	26	23	-	26
	19		20		21		22		23		24
23	-	26	23	-	26	23	-	26	23	-	26
	25		26		27		28		29		30
23	-	26	23	-	26	23	-	26	23	-	26

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

49		50		51		52		53		54
23 - 26		23 - 26		23 - 26		23 - 26		23 - 26		23 - 26

☐ 4. TOXIC  
(D000)

EPA Form 8700-12 (6-80) REVERSE

# MATERIAL SAFETY DATA SHEET

NPCAT

FOR COATINGS, RESINS AND RELATED MATERIALS

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)

DATE OF PREP

## SECTION I

MANUFACTURER'S NAME <b>STRIPPING PRODUCTS, INC.</b>		EMERGENCY TELEPHONE NO. <b>(203) 743-3263</b>
ADDRESS (Number, Street, City, State, and ZIP Code) <b>1115 Fowler Street, Old Hickory, TN 37138</b>		
CHEMICAL NAME AND SYNONYMS <b>Paint &amp; Varnish Remover,</b>		TRADE NAME AND SYNONYMS
CHEMICAL FAMILY	FORMULA <b>S.P.I. # 1.</b>	

## SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS <b>Mixture:</b>	<b>90</b>		FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES <b>Activator &amp;</b>	<b>10</b>		OTHERS		
OTHERS <b>Evaporation Retarders</b>					
HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES				%	TLV (Units)
<b>Methylene chloride,</b>				<b>70</b>	<b>500</b>
<b>Methyl Alcohol,</b>				<b>20</b>	<b>200</b>

## SECTION III - PHYSICAL DATA

BOILING POINT (°F.) (Range)	<b>104-- 149°F</b>	SPECIFIC GRAVITY (H <sub>2</sub> O=1)	
VAPOR PRESSURE (mm Hg.)	<b>280</b>	PERCENT VOLATILE BY VOLUME (%)	
VAPOR DENSITY (AIR=1)	<b>2.55</b>	EVAPORATION RATE (AIR=1)	
SOLUBILITY IN WATER	<b>partly miscible, (emulsifies).</b>		
APPEARANCE AND ODOR	<b>Amber colored liquid, /aromatic odor.</b>		

## SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	FLAMMABLE LIMITS	Lel	Uel
<b>none to boiling point, (T.C.C./T.O.C.)</b>	<b>not determined</b>		
EXTINGUISHING MEDIA <b>use A.B.C. type extinguisher; Foam type; Dry Chemical; /Carbon dioxide.</b>			
SPECIAL FIRE FIGHTING PROCEDURES <b>Fire fighting personell should use self-contained respirators while fighting fires in buildings where Varnish-Remover is stored.</b>			
UNUSUAL FIRE AND EXPLOSION HAZARDS <b>Contains chlorinated solvent. May form flammable vapor-air mixture at above ambient temperature. Do not cut drums with welding torches.</b>			



## SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

see section II

EFFECTS OF OVEREXPOSURE

Inhalation of high vapor concentrations may have results ranging from dizziness and headaches to unconsciousness.

EMERGENCY AND FIRST AID PROCEDURES

Eyes: flush with large amount of water. Get medical attention if irritated.  
Inhalation: remove patient to fresh air. If breathing difficulties develop give artificial respiration/oxygen. Get medical attention. Skin: wash and flush with plenty of water.

## SECTION VI - REACTIVITY DATA

STABILITY

UNSTABLE

CONDITIONS TO AVOID

STABLE

V

open flames and welding arcs can cause.

INCOMPATIBILITY (Materials to avoid)

thermal degradation with the evolution of Hydrogen Chloride and very

HAZARDOUS DECOMPOSITION PRODUCTS

Small amounts of Phosgene and Chlorine.

HAZARDOUS  
POLYMERIZATION

MAY OCCUR

CONDITIONS TO AVOID

WILL NOT OCCUR

V

## SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

provide adequate ventilation, cover spills with absorbent materials, (sand; sweeping compound). Place into covered metal containers.

WASTE DISPOSAL METHOD

Dispose of removed wastes in accordance with local, state, and or Federal regulations. If in doubt, contact local authorities or state EPA office.

## SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)

not to be used if adequate ventilation is provided.

VENTILATION

LOCAL EXHAUST

SPECIAL

Recommended industrial floor-level with tank/tank-tray hook-up.

MECHANICAL (General)

OTHER

PROTECTIVE GLOVES

Viton, Neoprene or similar.

EYE PROTECTION

Splash-proof goggles.

OTHER PROTECTIVE EQUIPMENT

Neoprene or rubber aprons, Arm protection, boots.

## SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Store in cool area; do not expose containers, (drums) to sunlight.

When opening drum, open bung part way and vent any accumulated pressure before removing the bung. In cold weather, when heating is

OTHER PRECAUTIONS

required; remove both(2) bungs before applying safety heating unit-electric

(Belt) to drums.

D.C. Dept. of Corrections  
VAD 9808 30788



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

CERTIFIED - RETURN  
RECEIPT REQUESTED

Marion D. Strickland, Director  
Government of the District of Columbia  
Department of Corrections  
Industrial and Agricultural Services  
P.O. Box 730  
Lorton, Virginia 22079

Dear Mr. Strickland:

Your letter of October 30, 1987 to the Department has been reviewed. Your request for an extension on compliance with Section C, Stipulation 4,5, and 6 of the Virginia Waste Management Board Enforcement Order of July 17, 1987 has been approved.

The information required to comply with the order should be forwarded to the Department by December 15, 1987.

If you have any question, please call Patrick Grover or me at (804)225-2667.

Sincerely,

Glenn Moore, Chemist  
Division of Technical Services

GM:260/lhc

U193	Soil and debris	May 8, 1992
U193	All others	Aug. 8, 1990
U194	Soil and debris	May 8, 1992
U194	All others	Aug. 8, 1990
U196	All	Aug. 8, 1990
U197	All	Aug. 8, 1990
U200	Soil and debris	May 8, 1992
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U208	All	Aug. 8, 1990
U209	All	Aug. 8, 1990
U210	All	Aug. 8, 1990
U211	All	Aug. 8, 1990
U213	All	Aug. 8, 1990
U214	All	Aug. 8, 1990
U215	All	Aug. 8, 1990
U216	All	Aug. 8, 1990
U217	All	Aug. 8, 1990
U218	Soil and debris	May 8, 1992
U218	All others	Aug. 8, 1990
U219	Soil and debris	May 8, 1992
U219	All others	Aug. 8, 1990
U220	All	Aug. 8, 1990
U221	Soil and debris	June 8, 1991
U221	All others	June 8, 1989
U222	Soil and debris	May 8, 1992
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U223	Soil and debris	June 8, 1991
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U227	All	Aug. 8, 1990
U228	All	Aug. 8, 1990
U234	Soil and debris	May 8, 1992
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U235	Soil and debris	June 8, 1991
U235	All others	June 8, 1989
U236	Soil and debris	May 8, 1992
U236	All others	Aug. 8, 1990
U237	Soil and debris	May 8, 1992
U237	All others	Aug. 8, 1990
U238	Soil and debris	May 8, 1992
U238	All others	Aug. 8, 1990
U239	All	Aug. 8, 1990
U240	Soil and debris	May 8, 1992
U240	All others	Aug. 8, 1990
U243	All	Aug. 8, 1990
U244	Soil and debris	May 8, 1992
U244	All others	Aug. 8, 1990
U246	All	Aug. 8, 1990
U247	All	Aug. 8, 1990
U248	All	Aug. 8, 1990
U249	All	Aug. 8, 1990

Virginia Waste Management Board  
Enforcement Order

*File* →

Re: Government of the District of Columbia  
Industries Division, Department of Corrections  
Lorton, Virginia  
VAD980830988

SECTION A: Findings

1. The Government of the District of Columbia, Industries Division, Department of Corrections, operates an Industries Division in Lorton, Virginia (hereinafter called Lorton) for which a "Notification of Hazardous Waste Activity" was filed with the United States Environmental Protection Agency (EPA) on January 26, 1984, declaring the facility to be a generator of hazardous waste listed or identified under Title 40, Code of Federal Regulations (CFR), Part 261.
2. Lorton was notified on April 7, 1986, by the Department of Waste Management (hereinafter called the Department), regarding the requirements of generators to file an annual report by March 1. Generator annual report forms and instructions for their completion had been sent to Lorton on January 31, 1986.
3. Lorton was notified on May 14, 1986 about the changes that became effective in the Virginia Hazardous Waste Management Regulations (VHWMR) on April 1, 1986. These changes dealt with Section 3.3 of the VHWMR concerning the negation of exclusions for the reuse, recycle, and reclamation of some beneficially used wastes.

4. Lorton was inspected by Department personnel on February 27, 1987. During this inspection numerous violations to the VHWMR were noted. These violations included: 1) Lorton had accumulated hazardous waste in excess of ninety (90) days (Section 6.4.E.1). 2) The containers of hazardous waste were not kept closed during storage. Several bungs were noted to be missing during the inspection (Section 9.8.D). 3) Storage containers of hazardous waste were kept in an area that was not inspected weekly and no logs were kept (Sections 9.8.E and 9.1.F.4). Some of the storage containers were in such poor condition that overpacking of the containers was necessary prior to their removal to an off-site facility. 4) Records indicating the initial and continual training of personnel in the handling and managing of hazardous waste were not available (Section 9.1.G). 5) Job titles, position descriptions, and the names of the personnel filling these positions were not available (Sections 9.1.G.4). 6) Tests and inspections of required equipment were not maintained (Section 9.2.C). 7) Adequate aisle space to allow the unobstructed movement of personnel and equipment during an emergency was not maintained (9.2.E). 8) Records documenting the preparation and distribution of a contingency plan were not available (Section 9.3).

#### SECTION B: Authority

1. In accordance with Section 3006(c) of the Resource Conservation and Recovery Act, the Commonwealth of Virginia was granted interim authorization for Phase I and Phase II Components A and B and final authorization to operate its hazardous waste program in lieu of the Federal hazardous waste program as published in the Federal Register on November 3, 1981, August 17, 1983, and December 18, 1984, respectively.

2. The State Board of Health was assigned responsibility for general supervision and control of hazardous waste management activities under Section 32.1-178 of the Code of Virginia (1950), as amended. This responsibility specifically included the promulgation of regulations. Section 32.1-180 of the Code required that no person treat, store, dispose, or transport hazardous waste without a permit from the Commissioner.

3. The State Board of Health did promulgate regulations controlling the generation and management of hazardous wastes entitled, "Commonwealth of Virginia, State Board of Health, Hazardous Waste Management Regulations". These regulations became effective May 21, 1981, with subsequent amendments effective October 1, 1981, December 1, 1982, July 1, 1983, November 1, 1983, September 20, 1984, October 1, 1984, and April 1, 1986.

4. Section 2.4 of the Virginia Hazardous Waste Management Regulations (VHWMR) requires all persons who generate, transport, treat, store, or dispose of hazardous waste to comply with the provisions of these regulations.

5. Clause 4 of Chapter 492 of the 1986 Virginia Acts of Assembly provides: "That as of July 1, 1986, the Department of Waste Management shall be deemed the successor in interest to the Department of Health to the extent that this act transfers powers and duties. Whenever in the Code of Virginia reference is made to the Department of Health concerning any authority, duty or responsibility relating to solid, hazardous or radioactive waste, such authority, duty or responsibility shall be deemed to pertain to the Department of Waste Management."

6. Clause 5 of Chapter 492 of the 1986 Virginia Acts of Assembly provides: "That regulations promulgated by the Department of Health concerning solid, hazardous and radioactive waste shall remain in force and effect until any such regulation is amended, modified or repealed by the Department of Waste Management."

7. Section 10-310 of the Code of Virginia (1950), as amended, authorizes the Virginia Waste Management Board to issue orders directing compliance with any provision of law or regulation of the Board. Orders of the Board are enforceable pursuant to Section 10-310 of the Code.

8. The Executive Director of the Department of Waste Management is empowered to act with the authority of the Virginia Waste Management Board when it is not in session.

#### SECTION C: Order

As a result of an informal conference on March 31, 1987, between the agents of the parties, the parties enter into this Enforcement Order after due consideration. It is the intent of the Department that the laws and regulations of this Commonwealth be most expeditiously served and that the environment and public health be protected by entering into this Order. It is the intent of Lorton to demonstrate its desire to fully comply with the laws and regulations and to avoid litigation between the parties.

Accordingly, it is ordered that:

1. Lorton shall immediately overpack all drums of hazardous waste that are in poor condition and insure that all drums of hazardous waste are kept in the accumulation area and are closed (Sections 9.8 of the VHWMR).
2. Lorton shall immediately place proper labels and accumulation dates on all containers of hazardous waste (Section 6.4.E of the VHWMR). Lorton shall maintain adequate aisle space at all times in the accumulation area as required under Sections 6.4.E and 9.2.E of the VHWMR.
3. Lorton shall not store hazardous waste in excess of the ninety (90) days allowed generators under Section 6.4.E of the VHWMR, unless an extension has been requested of and granted by the Department as required in Section 6.4.E.2 of the VHWMR.
4. Lorton shall submit to the Department within sixty (60) days of the effective date of this Order, documentation regarding the development of a training program for all personnel associated with hazardous waste activities as outlined in Sections 6.4.E and 9.1.G of the VHWMR.
5. Lorton shall deliver to the Department within ninety (90) days of the effective date of this Order, a contingency plan as required in Sections 6.4.E and 9.3 of the VHWMR.
6. Lorton shall deliver to the Department within 120 days of the effective date of this Order, letters of transmittal showing that the contingency plan, developed under #5, has been properly distributed to local authorities and agencies that may be requested to provide assistance during an incident.
7. Lorton shall conduct inspections as required under Sections 6.4.E, 9.2, and 9.8 of VHWMR and shall record these inspections as required under Sections 6.4.E and 9.1.F.4 of VHWMR.
8. Lorton shall comply with the VHWMR.

SECTION D: Stipulations

1. For the purpose of this proceeding, the Company admits the jurisdictional and factual allegations contained herein.
2. For the purposes of this proceeding, the Company waives the right to request further hearing on any issue of fact or law herein and consents to the terms and issuance of this Order.
3. The Company declares that fair and due process under the Administrative Process Act, Title 9, Chapter 1.1:1, Section 9-6.14 has been received.

This is an Order of the Virginia Waste Management Board and the Executive Director of the Department of Waste Management in accordance with Title 10-310 of the Code of Virginia (1950), as amended.

\_\_\_\_\_  
Cynthia V. Bailey  
Executive Director  
Department of Waste Management

The foregoing instrument was acknowledged before me this \_\_\_\_ day of \_\_\_\_\_, 1987, by Cynthia V. Bailey.

My Commission expires:

\_\_\_\_\_  
Notary Public

Seen and Agreed to:

\_\_\_\_\_  
The Government of the District of Columbia  
Industries Division  
Department of Corrections  
Box 18  
Lorton, Virginia 22079  
SLM:827.txt/sg

\_\_\_\_\_  
Date





# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, Va. 23219

**MAR 9 1987**

CERTIFIED RETURN  
RECEIPT REQUESTED

Marion Strickland  
Assistant Director  
Government of the District of Columbia  
Industries Division  
Department of Corrections  
Box 18  
Lorton, Virginia 22079

Re: VAD980830988

Dear Mr. Strickland:

On February 27, 1987, your facility was visited by Patrick Grover of our staff to discuss compliance with Virginia Hazardous Waste Management Regulations (VHWMR). Many violations were noted during the inspection as indicated on inspection checklists (copies enclosed). At the time of the visit, the facility was in violation of essentially all generator requirements set forth in the VHWMR. The Bureau is especially concerned that your facility:

1. Improperly stored hazardous waste for approximately 3 years without a permit;
2. Storage area was not adequate, i.e., drums were stored in muddy areas with standing liquids;
3. Drums had deteriorated to a point that required overpacking prior to transportation; and
4. Drums were left open (without bungs).

Due to the severity of the noted violations we request that your facility representative(s) meet with members from our enforcement staff and the Attorney General's Office to discuss possible enforcement alternatives. We request your presence in our office (directions enclosed) on Tuesday, March 31 at 1:30 p.m.

Marion Strickland  
Page2

If you have questions, please call Patrick Grover at (804) 225-2667.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. Gulevich".

Wladimir Gulevich, Ph.D., P.E., Director  
Division of Technical Services

Enclosures

cc: Sandra L. Morse  
Patrick O'Hare

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: Government of District of Columbia  
Address: Industries Division Department of Corrections  
Box 18, Lorton, VA 22079  
EPA Generator ID Number: VAD980830988  
Facility Inspection Representative: Raymond C. Sullivan  
Title: Industrial Manager  
Telephone Number: (703) 643-2142

VA HWM Regs.  
Reference:

- 6.3
1. Is a manifest system currently used by the generator so that off-site shipment of hazardous wastes can be tracked? ☒ Yes ☐ No
  2. Is the following included on the generators manifest?
    - 5.3.B.1. a) The generator's name, address, telephone number and EPA ID number. ☒ Yes ☐ No
    - 5.3.B.2. b) A unique five digit number assigned to this manifest by the generator. ☒ Yes ☐ No
    - 5.3.B.3. c) Total number of pages used to complete the manifest. ☒ Yes ☐ No
    - 5.3.B.4. d) The company name and EPA identification of each transporter. ☒ Yes ☐ No
    - 5.3.B.5. e) The company name, site address and the EPA ID number of the facility designated to receive the waste listed on the manifest. ☒ Yes ☐ No
    - 5.3.B.6. f) The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number (UN/NA), as identified in the Virginia Regulations Governing the Transportation of Hazardous Materials. ☒ Yes ☐ No

- 5.3.B.7. g) The units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form? ☒ Yes ☐ No
- 5.3.B.8. h) In case of international shipment, the point of departure (city & state) for those shipments destined for treatment, storage, and disposal outside the jurisdiction of the United States. N/A  
Yes No
- 5.3.C. i) The following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature.
- "I hereby declare that the content of this consignment are fully and accurately described above by proper shipping name and are classified packed, marked, and labeled, and condition for transport by [mode of transportation] according to applicable international and national governmental regulations."
- ☒ Yes ☐ No
- 6.5.C.2. 3. Have manifest been received from TSD for waste shipped over 45 days ago. ☒ Yes ☐ No
- if not,
- has the generator filed an exception report? Yes No
- 5.5.A.7. 4. Did the generator determine that the transporter has a Virginia transporter permit? *Alchem-Tron Inc ; McKesson* Yes No
- 6.4.E.1. 5. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes, Yes ☒ No
- 6.4.E.1.a. a) Is the waste placed in either containers or tanks? (If yes, fill out appropriate checklist. If no, TSD permit is required.) Yes No
- 6.4.E.1.b. b) Is the date accumulation of waste began clearly and visibly marked on each container and, does it indicate accumulation for less than 90 days? Yes ☒ No

*Facility has been accumulating on-site for >90 day without permit.  
Facility wants Generator's status in future*

- 6.4.E.1.c. c) During accumulation, are the storage containers and/or tank clearly labeled with the words Hazardous Waste? Yes ☒ No
- 9.1.G.1. 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? Yes ☒ No
- 9.1.G.2. 7. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? Yes ☒ No
- 9.1.G.3. 8. Do personnel participate in an annual review of their initial training? Yes ☒ No
- 9.1.G.4.a. 9. Does the facility maintain a record of:
- (a) job titles for personnel that are involved with hazardous waste management; and Yes ☒ No
- (b) the name of the employee filling each job? Yes ☒ No
- 9.1.G.4.b. 10. Does the facility have on record a written position description for each job title noted in Question #9? Yes ☒ No
- 9.1.G.4.c. 11. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? Yes ☒ No
- 9.1.G.4.d. 12. Does the facility have records to document this training? Yes ☒ No
- 9.2.B.  
9.2.D. 13. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? Yes ☒ No

- 9.2.B.2.                      b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.?      Yes ☒ No
- 9.2.B.(3, 4)                c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?      Yes ☒ No
- 9.2.C.                      14. Is a record of tests and inspections of required equipment (question 11) maintained at the facility?      Yes ☒ No
- 9.2.F.                      15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?      Yes ☒ No
- 9.3.A.1.  
6.4.E.1.d.                16. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water?      Yes ☒ No
- 9.3.                      17. Does the contingency plan contain the following elements:
- 9.3.B.(1, 2)                a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?      Yes ☒ No
- 9.3.B.4.                      b) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?      Yes ☒ No  
List primary coordinator.

Name \_\_\_\_\_

Title \_\_\_\_\_

Telephone \_\_\_\_\_

- 9.3.B.5. (c) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? Yes ☒ No
- 9.3.B.5. (d) Does this list specify the location and physical description of each item on the list and a brief description of each item on the list, and a brief outline of its capabilities. Yes ☒ No
- 9.3.B.6. (e) An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? Yes ☒ No
- 9.3.C. (f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List: Yes ☒ No
- \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- 9.3.B. (1) Is there documentation to indicate the personnel listed above received the contingency plan? Yes ☒ No
- 9.3.F.(9, 10) (g) If the contingency plan has been implemented, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed? Yes ☒ No
- 6.5.A. 18. Does the facility retain copies of all manifests, annual reports, and test results for at least three years? Yes ☒ No
- 6.5.B. 19. Has the facility submitted an annual report for the preceding calendar year? Yes ☒ No

20. Comments

drums  
Facility transported to ~~the~~ Belvoir for  
Fire Training. Belvoir accumulated then  
asked Lorton to pick-up it was transported  
back to Lorton in Lorton non-permitted  
vehicles

Inspector's Name: \_\_\_\_\_

Patrick Groves

Title: \_\_\_\_\_

Chemist

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_

2/23/87

Inspector's Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection: \_\_\_\_\_



CHECKLIST FOR RCRA INSPECTION OF USE  
AND MANAGEMENT OF CONTAINERS

Name of Facility: Government of District of Columbia  
Address: Industries Division, Department of Corrections  
Box 18, Lorton, VA 22079  
EPA Generator ID Number: VAD 980830988  
Facility Inspection Representative: Raymond C. Sullivan  
Title: Industrial Manager  
Telephone Number: (703) 643-2142

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities and generators accumulating less than 90 days (see § 6.4.E.1.a. that store containers of hazardous waste, except as § 9. provides otherwise.

VA HWM Regs.  
Reference

- |                        |   |                                      |  |
|------------------------|---|--------------------------------------|--|
| 9.8.B.                 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No                           |
| 9.8.C.                 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <input checked="" type="radio"/> Yes | <input type="radio"/> No                           |
| 9.8.D.1.               | 3. Are all containers holding hazardous waste kept closed during storage?   | Yes                                  | <input checked="" type="radio"/> No                |
| 9.8.E.                 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?  | Yes                                  | <input checked="" type="radio"/> No                |
| 9.1.F.2.a.<br>9.1.F.4. | 5. Is an inspection log maintained? (See question #7 of TSD checklist.)   | Yes                                  | <input checked="" type="radio"/> No                |
| 9.8.F.                 | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?  | N/A                                  | Yes <input type="radio"/> No <input type="radio"/> |
| 9.8.G.1.               | 7. Are incompatible wastes placed in separate containers? (See APPENDIX 9.4 for examples of incompatible waste).  | N/A                                  | Yes <input type="radio"/> No <input type="radio"/> |

9.8.G.3.

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices?

N/A

Yes No

9. Comments:

Deteriorated drums overpacked and  
moved off-site prior to inspection.  
Storage area muddy & standing liquids.  
Open hungs

Inspector's Name:

Patrick Grover

Title:

Chemist

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

2/27/87

Inspector's Name:

Title:

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building  
Richmond, Virginia 23219

Date of Inspection:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection D.C. Department of Corrections  
London, VA

DATE: 8/6/87

VAD980830988

FROM: Traci I. Self, Environmental Engineer TJS  
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO: FILE

THRU: John A. Armstead, Chief  
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE  
VIOLATIONS.



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, Va. 23219

JUL 22 1987

CERTIFIED RETURN  
RECEIPT REQUESTED


Marion D. Strickland  
Director  
D.C. Department of Corrections  
Industrial & Agricultural Services  
Post Office Box 730  
Lorton, Virginia 22079

Dear Mr. Strickland:

The Enforcement Order signed by you on July 8 has been signed by the Executive Director. The effective date is July 17, 1987. Enclosed is an original for implementation.


If you have questions, please contact me at (804) 225-2667.

Sincerely,

  
Sandra L. Morse, Compliance Director  
Division of Regulation

Enclosures

cc: Patrick Grover  
Patrick O'Hare





# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

Virginia Waste Management Board

Enforcement Order

Re: Government of the District of Columbia  
Industries Division, Department of Corrections

Lorton, Virginia

VAD980830988

### SECTION A: Findings

1. The Government of the District of Columbia, Industries Division, Department of Corrections, operates an Industries Division in Lorton, Virginia (hereinafter called Lorton) for which a "Notification of Hazardous Waste Activity" was filed with the United States Environmental Protection Agency (EPA) on January 26, 1984, declaring the facility to be a generator of hazardous waste listed or identified under Title 40, Code of Federal Regulations (CFR), Part 261.

2. Lorton was notified on April 7, 1986, by the Department of Waste Management (hereinafter called the Department), regarding the requirements of generators to file an annual report by March 1. Generator annual report forms and instructions for their completion had been sent to Lorton on January 31, 1986.

3. Lorton was notified on May 14, 1986 about the changes that became effective in the Virginia Hazardous Waste Management Regulations (VHWMR) on April 1, 1986. These changes dealt with Section 3.3 of the VHWMR concerning the negation of exclusions for the reuse, recycle, and reclamation of some beneficially used wastes.

4. Lorton was inspected by Department personnel on February 27, 1987. During this inspection numerous violations to the VHWMR were noted. These violations included: 1) Lorton had accumulated hazardous waste in excess of ninety (90) days (Section 6.4.E.1). 2) The containers of hazardous waste were not kept closed during storage. Several bungs were noted to be missing during the inspection (Section 9.8.D). 3) Storage containers of hazardous waste were kept in an area that was not inspected weekly and no logs were kept (Sections 9.8.E and 9.1.F.4). Some of the storage containers were in such poor condition that overpacking of the containers was necessary prior to their removal to an off-site facility. 4) Records indicating the initial and continual training of personnel in the handling and managing of hazardous waste were not available (Section 9.1.G). 5) Job titles, position descriptions, and the names of the personnel filling these positions were not available (Sections 9.1.G.4). 6) Tests and inspections of required equipment were not maintained (Section 9.2.C). 7) Adequate aisle space to allow the unobstructed movement of personnel and equipment during an emergency was not maintained (9.2.E). 8) Records documenting the preparation and distribution of a contingency plan were not available (Section 9.3).

#### SECTION B: Authority

1. In accordance with Section 3006(c) of the Resource Conservation and Recovery Act, the Commonwealth of Virginia was granted interim authorization for Phase I and Phase II Components A and B and final authorization to operate its hazardous waste program in lieu of the Federal hazardous waste program as published in the Federal Register on November 3, 1981, August 17, 1983, and December 18, 1984, respectively.

2. The State Board of Health was assigned responsibility for general supervision and control of hazardous waste management activities under Section 32.1-178 of the Code of Virginia (1950), as amended. This responsibility specifically included the promulgation of regulations. Section 32.1-180 of the Code required that no person treat, store, dispose, or transport hazardous waste without a permit from the Commissioner.

3. The State Board of Health did promulgate regulations controlling the generation and management of hazardous wastes entitled, "Commonwealth of Virginia, State Board of Health, Hazardous Waste Management Regulations". These regulations became effective May 21, 1981, with subsequent amendments effective October 1, 1981, December 1, 1982, July 1, 1983, November 1, 1983, September 20, 1984, October 1, 1984, and April 1, 1986.

4. Section 2.4 of the Virginia Hazardous Waste Management Regulations (VHWMR) requires all persons who generate, transport, treat, store, or dispose of hazardous waste to comply with the provisions of these regulations.

5. Clause 4 of Chapter 492 of the 1986 Virginia Acts of Assembly provides: "That as of July 1, 1986, the Department of Waste Management shall be deemed the successor in interest to the Department of Health to the extent that this act transfers powers and duties. Whenever in the Code of Virginia reference is made to the Department of Health concerning any authority, duty or responsibility relating to solid, hazardous or radioactive waste, such authority, duty or responsibility shall be deemed to pertain to the Department of Waste Management."

6. Clause 5 of Chapter 492 of the 1986 Virginia Acts of Assembly provides: "That regulations promulgated by the Department of Health concerning solid, hazardous and radioactive waste shall remain in force and effect until any such regulation is amended, modified or repealed by the Department of Waste Management."

7. Section 10-310 of the Code of Virginia (1950), as amended, authorizes the Virginia Waste Management Board to issue orders directing compliance with any provision of law or regulation of the Board. Orders of the Board are enforceable pursuant to Section 10-310 of the Code.

8. The Executive Director of the Department of Waste Management is empowered to act with the authority of the Virginia Waste Management Board when it is not in session.

#### SECTION C: Order

As a result of an informal conference on March 31, 1987, between the agents of the parties, the parties enter into this Enforcement Order after due consideration. It is the intent of the Department that the laws and regulations of this Commonwealth be most expeditiously served and that the environment and public health be protected by entering into this Order. It is the intent of Lorton to demonstrate its desire to fully comply with the laws and regulations and to avoid litigation between the parties.

Accordingly, it is ordered that:

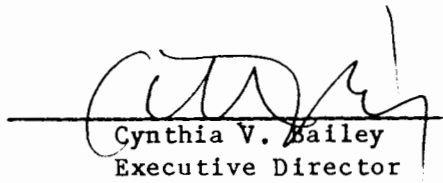
1. Lorton shall immediately overpack all drums of hazardous waste that are in poor condition and insure that all drums of hazardous waste are kept in the accumulation area and are closed (Sections 9.8 of the VHWMR).
2. Lorton shall immediately place proper labels and accumulation dates on all containers of hazardous waste (Section 6.4.E of the VHWMR). Lorton shall maintain adequate aisle space at all times in the accumulation area as required under Sections 6.4.E and 9.2.E of the VHWMR.
3. Lorton shall not store hazardous waste in excess of the ninety (90) days allowed generators under Section 6.4.E of the VHWMR, unless an extension has been requested of and granted by the Department as required in Section 6.4.E.2 of the VHWMR.
4. Lorton shall submit to the Department within sixty (60) days of the effective date of this Order, documentation regarding the development of a training program for all personnel associated with hazardous waste activities as outlined in Sections 6.4.E and 9.1.G of the VHWMR.
5. Lorton shall deliver to the Department within ninety (90) days of the effective date of this Order, a contingency plan as required in Sections 6.4.E and 9.3 of the VHWMR.
6. Lorton shall deliver to the Department within 120 days of the effective date of this Order, letters of transmittal showing that the contingency plan, developed under #5, has been properly distributed to local authorities and agencies that may be requested to provide assistance during an incident.
7. Lorton shall conduct inspections as required under Sections 6.4.E, 9.2, and 9.8 of VHWMR and shall record these inspections as required under Sections 6.4.E and 9.1.F.4 of VHWMR.
8. Lorton shall comply with the VHWMR.

SECTION D: Stipulations

1. For the purpose of this proceeding, the Company admits the jurisdictional and factual allegations contained herein.
2. For the purposes of this proceeding, the Company waives the right to request further hearing on any issue of fact or law herein and consents to the terms and issuance of this Order.
3. The Company declares that fair and due process under the Administrative Process Act, Title 9, Chapter 1.1:1, Section 9-6.14 has been received.



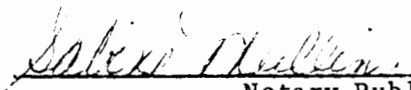
This is an Order of the Virginia Waste Management Board and the Executive Director of the Department of Waste Management in accordance with Title 10-310 of the Code of Virginia (1950), as amended.

  
Cynthia V. Bailey  
Executive Director  
Department of Waste Management

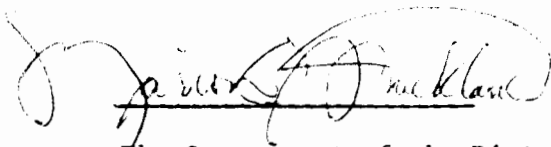
The foregoing instrument was acknowledged before me this 17 day of July, 1987, by Cynthia V. Bailey.

My Commission expires:

October 14, 1987

  
Notary Public

Seen and Agreed to:



The Government of the District of Columbia  
Industries Division  
Department of Corrections  
Box 18  
Lorton, Virginia 22079

7/8/87 Date